

**United States District Court
Southern District Of New York**

Melinda Serin, Judson Russ, Long Soui Lim,
Peri Kettler, Gordon Redner, and Thomas J. Smith,

Plaintiffs

v.

Northern Leasing Systems, Inc., Jay Cohen,
Rich Hahn, and Sara Krieger

Defendants

No. 06 CV 1625 (SCR)

Attorneys' Affirmation In Opposition to

Defendants' Motion To Dismiss Amended Complaint

Krishnan Chittur, an attorney duly admitted to the bar in New York, hereby solemnly affirms and states under penalty of perjury:

1. I am a principal of Chittur & Associates, P.C., attorneys of record for the Plaintiffs herein.
2. Attached herein are true and correct copies of the following documents:
 - a. Exhibit 1 - Mailings referred to in the Amended Complaint;
 - b. Exhibit 2 - Reports in News Media:
 - i. S. Kelleher, *Merchants Complain Credit-Card machine peddlers trap them into costly leases*, The Seattle Times, Oct 19, 2008;
 - ii. Transcript of *Is a Corporation Scamming Small Businesses?* broadcast on New York channel 7 (ABC News) on May 17, 2007;
 - iii. Transcript of *Alleged Fraud Targeting Small Businesses?* (broadcast on New York channel 7 (ABC News) on June 12, 2007);
 - iv. C. Young, *"Nationwide scheme' in Orange County: 2 businesses say leasing company altered contracts,"* Times Herald-Record, Feb. 24, 2008.

- c. Exhibit 3 - News Releases from Attorney General of Missouri:
 - i. *“Firm that leases credit Card machines defrauded small businesses in Missouri of thousands of dollars, Nixon says”;*
 - ii. *“Firm that leases credit Card machines to pay \$25,000 in restitution, \$5,000 to the state in agreement with Nixon.”*

- d. Exhibit 4 - Decision of New York State Supreme Court, New York County,
Justice Jane S. Solomon in *Northern Leasing Systems, Inc. V. Tirner*, I. No.
602006/04 (Oct. 15, 2008).

Dated: New York, New York
January 14, 2009

/S/
Krishnan Chittur, Esq.